

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION**

ALEXIS WELLS,)
)
Plaintiff/Counter-Defendant,)
)
 v.) **Civil Action No. 3:21-cv-00047-JRS-MPB**
)
THE FREEMAN COMPANY, and)
TIMOTHY VAUGHN, individually,)
)
Defendant/Counter-Plaintiff.)

TIMOTHY VAUGHN'S FINAL LIST OF EXHIBITS

Pursuant to the Case Management Plan approved by this Court, Defendant/Counter-Plaintiff, Timothy Vaughn, by counsel, respectfully submits the following as his final list of exhibits that may be relied upon at the trial of this matter, other than those that may be used solely for purposes of impeachment or rebuttal.

1. Second Amended Complaint;
2. Vaughn's Answer, Affirmative Defenses and Counter-Claims to Second Amended Complaint;
3. Deposition of Timothy Vaughn;
4. Glitz&Glo Social Media Advertisements;
5. Deposition of Alexis Wells;
6. Deposition of Lloyd Ellis;
7. Deposition of Drake Oldham;
8. Recording of Tim Vaughn and Drake Oldham conversation recorded by Drake Oldham;
9. Transcript of recording of conversation between Tim Vaughn and Drake Oldham conversation recorded by Drake Oldham;

10. Electronic message between Drake Oldham and James Wells of Oldham sending the recording of Oldham and Vaughn conversation to James Wells;
11. Plaintiff's communications with Western Kentucky University;
12. Plaintiff's arrest record;
13. Plaintiff's academic transcripts;
14. Orange County Sheriff's Office Incident Report;
15. Letter Vaughn received from Western Kentucky University regarding Wells and restrictions regarding coming onto campus;
16. Wells' Responses to Requests for Admissions from matter 82D03-2001-PO-363;
17. Live Photos of Wells from the evening in question from the Complaint;
18. Social Media posts regarding Wells' Glitz and Glo business;
19. Wells Letter to Freeman April 20, 2020;
20. Text messages between Timothy Vaughn and Lloyd Ellis; regarding lunch/dinner plans; dated January 19 through January 21, 2020;
21. Receipt from Rosen Shingle Creek resort; dated January 19, 2020;
22. Text messages between Timothy Vaughn and Alexis Wells; dated January 11, 2020 through January 15, 2020;
23. Text messages between Timothy Vaughn and Alexis Wells; dated January 18, 2020 through January 22, 2020;
24. Text messages between Timothy Vaughn, Alexis Wells, and Lloyd Ellis; dated January 19, 2020 through January 20, 2020;
25. Text messages between Timothy Vaughn, Alexis Wells, James Wells, Stephanie Vaughn, and Julie Wells; dated January 19, 2020 through January 22, 2020;

26. Text messages between James Wells and Alexis Wells;
27. Orange County Sheriff's Office statement filed by Alexis Wells;
28. Plaintiff Alexis Wells' medical and mental health records (Wells – 08759-08823; 09499-09508; 09599-099920; 001397-001405; 10197-10217);
29. Text messages between Plaintiff and Julie Wells;
30. Text messages between Plaintiff and Katy Bennett;
31. Text messages between Plaintiff and Camryn Cater;
32. Text messages between Plaintiff and Katy Bennett;
33. Text messages between Plaintiff and "Aunt Karen";
34. Text messages between Plaintiff and "Kendall";
35. Expert report of Dr. Robert Arias and any documents on which he relied in forming his opinions;
36. Expert report of Dr. Amanda Pfeffer and any documents on which she relied in forming her opinions;
37. Expert report of Dr. Sean Samuels and any documents on which he relied in forming his opinions;
38. Letter Vaughn received from Western Kentucky University dated March 3, 2020 regarding Plaintiff;
39. Any and all exhibits subsequently identified; and,
40. Any and all exhibits necessary for impeachment or rebuttal purposes.

Discovery, dispositive motion briefing, and trial preparation is ongoing and, therefore, additional exhibits may be identified. Vaughn hereby reserves the right to supplement or

otherwise amend the foregoing list of exhibits. If Vaughn identifies any additional exhibits, the parties will be promptly notified.

Respectfully submitted,

/s/Kyle F. Biesecker

Kyle F. Biesecker

B. Michael Macer

BIESECKER DUTKANYCH & MACER, LLC

411 Main Street

Evansville, Indiana 47708

Telephone: (812) 424-1000

Facsimile: (812) 424-1005

Email: kfb@bdlegal.com

mmacer@bdlegal.com

Attorneys for Timothy Vaughn

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2021, a copy of the foregoing was filed electronically. Service will be made electronically on all ECF-registered counsel of record via email generated by the Court's ECF system.

/s/ Kyle F. Biesecker

Kyle F. Biesecker